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HEARING DATE: December 9, 2021, at 10:00 a.m. (Eastern Time)

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Counsel to Creditor, The Holtz Firm Party One A and Party One B

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
In re:	:	Chapter 7
RACHEL UCHITEL, an individual,	:	Case No. 20-11585 (JLG)
Debtor.	:	
	:	
	X	

SUPPLEMENTAL DECLARATION OF MICHAEL D. HOLTZ IN SUPPORT OF MOTION FOR RELIEF FROM STAY *NUNC PRO TUNC*, PURSUANT TO SECTION 362(d)(1) OF THE BANKRUPTCY CODE

- I, Michael D. Holtz, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- 1. I am a principal of The Holtz Firm, creditor herein for Party One A and Party One B (collectively, "Movant"). The facts stated herein are known to be true based upon my personal knowledge. I am over 18 years of age, and if called upon to testify, I could and would competently testify to each of the facts set forth herein.
- 2. I make this Declaration in support of the *Motion for Relief From Stay Nunc Pro Tunc, Pursuant to Section 362(d)(1) of the Bankruptcy Code, Rules 4001 and 9014 of the Federal Rule of Bankruptcy Procedure, and Local Rule 4001-1* (the "Motion"). Unless stated otherwise, all defined terms herein shall have the meanings ascribed to them in the Motion.
- 3. The Non-disclosure Undertaking is governed by California law and the extant Arbitration is pending before JAMS in California.
 - 4. I receive mail, and I received the Discharge Notice, at my offices in Los Angeles, California. Due to the worldwide COVID-19 pandemic, and in accordance with stay-at-home

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orders in effect in California, my offices were closed during all of the months of October, November, and December of 2020, among other months. During the period when my offices were closed, including without limitation the foregoing identified months, the delivery of mail to my offices was intermittently interrupted. To my knowledge, after inquiry, no mail that was received at my offices was not delivered to me.

5. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: November 11, 2021 Los Angeles, California

By: Wichael Holtz
Michael D. Holtz